

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

KAYRA M. HERNÁNDEZ
Plaintiff

v.

CASA FEBUS, INC., *et al.*
Defendants.

Case no.: 21-cv-01588-SCC-MEL

District Judge Carreño

**MOTION FOR A FIVE DAY EXTENSION TO COMPLY WITH THE COURT'S ORDER
AT DOCKET 172 REGARDING PAYMENT OF ATTORNEY'S FEES**

TO THE HONORABLE COURT:

Defendants, by and through undersigned counsel, respectfully state, allege, and pray as follows:

1. This Court has ordered Defendants to issue the attorney's fees payment by October 23, 2023. For the reasons stated below, a brief five (5) day extension is requested.
2. The Court has ruled to award plaintiff's counsel legal fees in connection with litigation of the temporary restraining order ("TRO"). However, despite the Court's determination to award such fees, the Court should substantially reduce the awards. Opposing counsel's hourly rates nor the number of hours spent on the TRO litigation are reasonable or necessary.

3. The amount of a fee award is “largely discretionary” and although the courts for the First District often employ the lodestar method (“involves multiplying the reasonable number of hours spent on the case by a reasonable hourly rate to determine the fee award,” Siegel v. Berkshire Life Ins. Co., 835 N.E.2d 288, 294 (Mass. App. Ct. 2005)), to calculate such awards, a number of other factors may be considered. RFF Family
4. Partnership, LP v. Ross, 814 F.3d 520, 537-38 (1st Cir. 2016) citing Twin Fires Inv., LLC v. Morgan Stanley Dean Witter & Co., 837 N.E.2d 1121, 1138 (Mass. 2005).
5. Counsel for Defendants wishes to address some of these factors and respectfully requests a five (5) day extension to properly address them.
6. This request is supported mainly by undersigned’s health related setbacks and in not in the least to cause undue delay.

ACCORDINGLY, it is respectfully requested that the Court grant this motion.

Dated: October 23, 2023.

Respectfully Submitted,

s/José B. Vélez Goveo

José B. Vélez Goveo
Attorney for Defendants
Vélez & Vélez Law Office
58 Esteban Padilla
Suite 201

Bayamón, P.R. 00960
P.O. Box 7007
Bayamón, P.R. 00960

T. (787) 780-4911
F. (787) 787-9892
C. (787) 246-0486

Jose@velezvelezlaw.com

CERTIFICATION OF SERVICE

I hereby certify that on this 23rd day of October 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

s/José B. Vélez Goveo
José B. Vélez Goveo